

**UNITED STATES DISTRICT
COURT EASTERN DISTRICT OF
LOUISIANA**

UNITED STATES OF AMERICA

* CRIMINAL DOCKET NO. 09-005

v.

* SECTION: "A" (2)

STEVEN R. HANSEN

* VIOLATIONS: 18 U.S.C. § 1028 (f)
18 U.S.C. § 1344

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FACTUAL BASIS

Should this matter have gone to trial, the Government would have proved through the introduction of competent testimony and admissible tangible exhibits, including documentary evidence, the following to support the allegations charged by the Government in counts one through five of the indictment now pending against the defendant, **STEVEN R. HANSEN**, (hereinafter "**HANSEN**" or "defendant") to wit: four counts of wire fraud in violation of Title 18, United States Code, Sections 1343 and 2; and, one count of misuse of a social security number in violation of Title 42, United States Code, Section 408(a)(7)(B).

Evidence would be adduced at trial which would show that on and during the months of October through December, 2004, **HANSEN** used multiple schemes designed to fraudulently acquire automobiles for his use and for the use of other employees of his company.

The evidence would show that **HANSEN**'s first scheme involved a October/November 2004, attempt to acquire several cars through Bizfleet.com and its salesman located in Stuart, Florida. **HANSEN** caused several young employees, "C.H." and "C.R." who had worked there less than a month to, via facsimile, receive and transmit various applications and documents prepared by **HANSEN** and

under his direction to acquire 2 to 5 vehicles in **HANSEN's** company's name, Modern Technology, Inc., (MTI). These faxed attempts included the submission of fraudulent documents prepared by **HANSEN**, or at his direction, including bank statements, corporate tax returns and credit applications on three separate occasions on November 11, 2004. These documents contained false and fraudulent representations and promises as to the financial solvency of **HANSEN's** company artificially inflating its value in an attempt to establish creditworthiness and secure the approval for leasing vehicles. No approvals were ever granted by Bizfleet.com.

Also from October to December 2004, **HANSEN** used the same employees and others to attempt to acquire several BMW vehicles from Brian Harris, BMW in Baton Rouge, Louisiana. Specifically he used (A.I.'s) name, SSN, (XXX-XX- 6536) and the date of birth of A.I., to attempt to lease/purchase two BMW automobiles from the Baton Rouge dealership. Additionally, **HANSEN** caused to be faxed a copy of A.I.'s driver's license from MTI's Metairie office to the Baton Rouge dealership, on or about November 29, 2004, with the intent to deceive the dealership into believing they were dealing with A.I. for the purpose of approving the creditworthiness of the proposed lease purchase and in delivering the vehicles to the proper lease/purchaser. Co-worker employee's would testify that they, at the direction of **HANSEN**, were involved in filling out the paperwork and/or overheard various phone conversations involving **HANSEN's** attempts to lease these and other vehicles. An employee would testify, that after overhearing **HANSEN**, pose as A.I. over the phone on the day **HANSEN** attempted to gain possession of the vehicles she contacted and warned the dealership of the scheme to acquire the vehicles misusing A.I.'s SSN and other identifying information.

FBI agent's would testify that **HANSEN** in June 2005 admitted signing A.I.'s name to the faxed application and to other documents when he attempted to pick up the vehicles. That **HANSEN**, while

located in Metairie, Louisiana, posed as A.I. in at least one telephone conversation with the car dealership in Baton Rouge, and he signed A.I.'s name and used A.I.'s SSN in several credit application documents which he faxed within the state. Evidence would be presented that **HANSEN** was aware that the information from these faxes was input into BMW Financial Services system and transmitted out of state. Documentary evidence would establish that **HANSEN** signed a Commercial Lending Services Business Credit Application with Bizfleet.com on or about November 11, 2004. FBI agents would testify that **HANSEN** admitted to continuing to use different co-applicant's names until he was approved with the use of A.I.'s identifying information and that **HANSEN** admitted to his involvement and use of A.I.'s name in attempting to secure control of these vehicles. Additionally, the agents would testify that **HANSEN** traveled from New Orleans, to Sorrento, Louisiana, on or about November 29, 2004, and continued to represent himself as A.I., signing A.I.'s name to at least ten forms. Testimony would be adduced that the only reason the cars were not released to **HANSEN** because he could not produce any identification that he was in fact A.I. and the dealer had been tipped off by one of **HANSEN**'s employees in the Metairie office that **HANSEN** was posing as A.I..

Documentary evidence would show that in November 2004, **HANSEN** completed a BMW Financial services application in the name of MTI and used A.I.'s, name and SSN as the personal guarantor and co-applicant and that he signed A.I.'s name to this document and his own as the corporate officer certifying A.I. as the officer empowered to execute any lease. This document was transmitted via fax on or about November 29, 2004, from New Orleans to the dealership in Baton Rouge, who in turn entered the information into BWM's on-line credit application system whose office is located in New Jersey. Documentary evidence would show that approval for the transaction was given by BMW financial services, based on A.I.'s co-applicant status. Additionally, approval was premised in part on

fraudulent tax returns allegedly prepared by a CPA named Jack Taylor, but in fact prepared by **HANSEN** and a copy of a driver's license issued to A.I. by the State of Texas. Finally, as proof of residence, the evidence would show that **HANSEN** submitted a phone bill showing A.I. resided with R.H. (Hansen's father) at an address located at XXX03 Brittany Drive in Lacombe, LA. As part of the scheme, **HANSEN** faxed or caused to be faxed, a certificate of insurance for two BMW vehicles was secured and faxed to the leasing agency on November 29, 2004. Credit approval was given for the leases by BMW finance to MTI in the name of A.I. and that approval was transmitted to Brian Harris BMW in Baton Rouge on or about November 29, 2004. The evidence would show that the salesman attempted to deliver one of the vehicles to "A.I." in Sorrento, Louisiana, but because **HANSEN** who identified himself as "A.I." could not produce a driver's license, the salesman would not release the vehicle and that even after this **HANSEN** tried several other times to obtain the vehicles by proving that he was A.I. all without success.

FRANK DESALVO
Date Counsel for Defendant
Louisiana Bar Roll No. _____

TONY GORDON SANDERS Date
Assistant United States Attorney
Louisiana Bar Roll No. 11705

STEVEN R. HANSEN Date
Defendant _____